

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BABY DOE, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Case No. 3:22-cv-49-NKM
)	
JOSHUA MAST, <i>et al.</i>)	
)	
Defendants,)	
)	
and)	
)	
UNITED STATES SECRETARY OF)	
STATE ANTONY BLINKEN, <i>et al.</i> ,)	
)	
Nominal Defendants.)	
)	

**DEFENDANTS JOSHUA AND STEPHANIE MAST'S SECOND
REQUESTS FOR PRODUCTION TO PLAINTIFFS JANE AND JOHN DOE**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, and the applicable Local Rules of the Western District of Virginia, Defendants Joshua and Stephanie Mast, by counsel, submit the following Requests for Production of Documents (the “Requests”) to Plaintiffs Jane and John Doe. Plaintiffs’ responses are due as required by the Federal Rules of Civil Procedure.

DEFINITIONS AND INSTRUCTIONS

1. The “Action” means the above-captioned action.
2. The phrases “You,” “Your,” and “Plaintiffs” each mean or refer to the persons identified in the Complaint as Jane and John Doe, as well as their agents and attorneys, and any other Person acting on their behalf.

3. "Complaint" means the Amended Complaint filed by Plaintiffs in this Action on October 28, 2022.

4. "Communication" is used in its broadest sense to encompass any transmission or exchange of information, ideas, facts, data, proposals, or any other matter, whether between individuals or between or among the members of a group, whether face-to-face or by telephone, whether oral or in writing, or whether by means of electronic or other media.

5. "Relating to" a certain subject means constituting, referring to, discussing, analyzing, comprising, embodying, recording, evidencing, or containing any information that pertains to the subject matter addressed in the request.

6. "Document" means all writings of any kind whatsoever, whether handwritten, typed, printed, computerized, or otherwise visually reproduced, including but not limited to files, communications, emails, accounting records, memoranda, reports, notes, instructions, correspondence, letters, email messages, diaries, calendars, day-timers, telegrams, investigations, summaries, spreadsheets, data compilations, articles, schedules, notebooks, computer printouts, invoices, or records of payment, as well as any drafts or marginal comments appearing in such documents, and shall include, but not be limited to, any document of whatever form upon which information was recorded, and shall include separately any document which is a non-identical copy of another.

7. "Person" means the plural, as well as the singular, and includes natural persons, corporations, public corporations, governments, governmental agencies, partnerships, groups, firms, associations, or other organizations or entities of any description.

8. For purposes of these Requests, the word "and" includes the disjunctive "or" and the word "or" includes the conjunctive "and." Words in the singular shall be interpreted to include

both the singular and the plural. A masculine, feminine, or neuter form of a word shall be interpreted to include the other genders. The use of any tense of any verb shall be interpreted to include all other tenses.

9. If You assert that a privilege limits Your obligation to provide a response to any Request, Your objection should set forth: (1) the nature of the privilege asserted (*i.e.*, attorney-client, etc.); (2) a sufficient description of the facts upon which You base Your objection to apprise the Court of Your entitlement to the claim; (3) the date and place of any document's creation along with the document's drafter, the identity of any intended recipients, and a brief description of its substantive contents

REQUESTS FOR PRODUCTION

8. All Documents You received from any federal or state governmental entity pursuant to any request made by You, Your attorneys, or anyone else under any federal or state Freedom of Information Act or other request for information relating to Baby Doe, the Masts, or the subject matter of this litigation.

9. All Documents between You and any person in Afghanistan relating to Baby Doe, or this proceeding, or any state court proceeding involving Baby Doe from the date John and Jane Doe arrived in the United States to the present.

10. All Documents relating to a risk of harm to John Doe, Jane Doe, or any persons in Afghanistan arising from Baby Doe or this litigation, including but not limited to the identification of Baby Doe.

11. All Documents from August 1, 2021 through November 30, 2021 between John or Jane Doe and any person relating to or discussing Baby Doe, the Masts, or the subject of this litigation.

12. All Documents relating to John and Jane Doe's claims, applications or filings for asylum or any other immigration status or process with United States Citizenship and Immigration Services.

13. All Documents received from all subpoena duces tecum in this proceeding or the state court proceeding (CL22000186-00), including but not limited to the subpoena duces tecum results from the U.S. Conference of Catholic Bishops.

14. All Documents with law enforcement relating in any way to Baby Doe, the Masts, or the subject matter of this litigation, to include the Department of Justice, the Department of Defense's Office of General Counsel, the Department of State, and Department of Homeland Security, from the date John and Jane Doe entered the United States to the present.

15. All Documents with anyone from Project ANAR (Afghan Network for Advocacy and Resources), including but not limited to Laila Ayub and Wogai Mohmand.

16. All Documents related to or supporting Your answers to the Masts' Interrogatories.

Dated: August 10, 2023

Respectfully submitted,

/s/ Michael Francisco
Michael Francisco
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